


April 3, 2020

VIA ECF

Hon. Lewis J. Liman
United States District Court Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

4/7/2020

SO ORDERED.



LEWIS J. LIMAN
United States District Judge

Re: *Vivian Xiang v. Eagle Enterprises, LLC, et al.*, 19 Civ. 1752 (LFL)

Dear Judge Liman:

We represent defendants Eagle Enterprises LLC, Market America, Inc., Amy Remache, and Sherry Spesock in the above-mentioned matter. The parties jointly submit the attached fully executed protective order and respectfully request that the Court proceed with so-ordering the protective order, in accordance with Rules 1(B) and 2(F) of Your Honor's Individual Rules. The fully executed protective order closely conforms to Your Honor's model protective order.

At this time, the parties are preparing to exchange discovery pursuant to the Court's Second Amended Standing Administrative Order (M10-468) and in advance of Court-referred mediation, which is currently scheduled for April 23, 2020, but due to the nationwide social distancing guidelines in effect until the end of April and the State Governor's PAUSE Executive Order likely to be extended until then as well, the parties have agreed to adjourn mediation until late May or June and are currently discussing alternate dates and coordinating such with the mediator. We will respectfully apprise the Court of the new mediation date accordingly.

We thank Your Honor for Your consideration in, and attention to, this matter.

Encl. – Executed Protective Order

Respectfully submitted,

/s/ Theresa D'Andrea
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